

# **EXHIBIT A**

**CeCe Cole**

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**From:** Stephen Doniger <stephen@donigerlawfirm.com>  
**Sent:** Friday, May 19, 2023 1:34 PM  
**To:** Benjamin Halperin; London Zamora; mark@csrlawyers.com; Nancy Wolff; CeCe Cole; Lance Koonce; Zach Press  
**Cc:** Scott Burroughs  
**Subject:** Freeman v. Wolff -- Retailer lawsuits

**External Email**

Counsel,

As a courtesy we are writing to let you know that we have filed an additional action against Apple, Inc. in the NDCA related to its sales of copies of the Crave series (23-cv-2426). We also filed an amended complaint in the Amazon case which removed Barnes & Noble as a defendant (given its headquarters in NY) and filed a new case against B&N in SDNY (23-cv-4145). We will file notices of related cases in those matters as we did in the Amazon case, and will agree to stay those actions pending a determination of the copyright claims on the merits in Case 22-cv-2435. Please let us know if you have any other thoughts or would like to discuss.

Best,

Stephen M. Doniger, Esq.  
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